

Request for Public Comment
Maryland Health Benefit Exchange
Navigator Program and Consumer Assistance

Background

The Patient Protection and Affordable Care Act (ACA) provides new funding to expand Medicaid eligibility levels and build a State Health Benefit Exchange (HBE or Exchange) that will help connect consumers and employers to Qualified Health Plans (QHPs) for coverage.

To meet the needs of the large number of consumers who will become newly eligible for health insurance in 2014, the ACA charges Exchanges with establishing a network of “Navigators” that will assist consumers in accessing coverage in the new state Exchange through:

- Outreach and education regarding the availability of qualified health plans;
- Distribution of fair and impartial information concerning enrollment in qualified health plans, and the availability of premium tax credits and cost sharing assistance;
- Facilitating enrollment in qualified health plans;
- Referring to consumer assistance agencies or entities; and
- Providing information in a manner that is culturally and linguistically appropriate to the needs of the population.

More information, including the Maryland Health Benefit Exchange Act of 2011, can be found at <http://dhmh.maryland.gov/healthreform/exchange/>.

Solicitation of Public Comment

The Maryland Health Benefit Exchange Act authorized a study of the design and implementation of the Navigator and other consumer assistance programs. As part of this study, Maryland Exchange leaders seek public comment on key design and implementation questions. The Exchange is specifically looking for feedback on the questions below. Respondents do not need to provide responses to all questions below; partial responses will be accepted. In addition, comments on other issues related to the Navigator program and/or other consumer assistance are welcome.

Please note that the Exchange also encourages members of the public to attend and comment during regularly scheduled Navigator and Enrollment Advisory Committee meetings. A calendar of meetings can be found here: [\(enter link\)](#).

Key Dates and Submission Information

Please submit all written feedback by 5 PM Friday, October 7, 2011. Submissions should be sent to Sharon Woda at swoda@manatt.com.

Questions for Public Comment

- What should the role and scope of work be for Navigators in Maryland's HBE? How should the program be designed to ensure that Navigators accomplish these successfully? For instance, you may consider:
 - Outreach and education
 - Application assistance (ACA requires the Exchange to offer online, in person, mail and phone applications)
 - Referring to and interaction with Consumer Assistance Programs
 - Assistance with health plan selection
 - Advocacy on behalf of consumers with the Exchange
 - Advocacy on behalf of consumers with health plan
 - Others?
- What are the best strategies for reaching target populations, including:
 - Non-group
 - Small group
 - Medicaid / subsidized population
 - Other targeted populations?
- What skill sets and experience should be required of Navigators? How should training be designed and delivered?
- What should be the process to certify Navigators' skills and knowledge? Should those processes be applied to all Navigators?
- How should the Exchange ensure that Navigators provide information in a manner that is culturally, linguistically and otherwise appropriate to the needs of the diverse populations served by the Exchange?
- What should be the relationship between existing health insurance Agents/Brokers/Producers and Navigators? Between Navigators and the Consumer Assistance Program?
- What is the potential impact of the Navigator Program on the existing health insurance distribution system? For example, what could be the impact of the Navigator Program on role of Agent/Brokers/Producers in the state?
- The ACA requires the Exchange to operate the Navigator Program with operational funds and not Federal grant dollars. How should the program be financed?
- Please list here anything else the Exchange should consider in designing the Navigator Program